

October 10, 2001

Mr. Sam Becker, Director
U.S. Environmental Protection Agency
Region 6
Water Quality Protection Division (6WQ)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Mr. Becker:

The Louisiana Department of Environmental Quality (LDEQ) was requested by your staff to provide definitions and derivations of several generic, qualitative "suspected cause" categories as identified on the state's Section 303(d) list of impaired waterbodies. These suspected cause categories identify no specific parameter and were used by LDEQ based on EPA Section 305(b) report guidance. We also used the categories as part of an EPA recommended evaluative assessment for 305(b) reporting.

To define and derive the meaning of these suspected causes listings, LDEQ went back to the regional coordinators who made the evaluative assessment and conducted a review of other data and information available on some suspected cause categories in the Calcasieu and Ouachita River Basins to see if specific parameters of concern could be determined. Those parameters identified by the review were further investigated to see if documentation or evidence demonstrates impairment of a water use or whether there is justification for delisting.

The suspected cause categories for which definitions and derivations were made are for priority organics, non-priority organics, other inorganics, and unknown toxicity. The review showed that in most cases the listings for these suspected cause categories were made only for qualitative planning purposes or where some parameter may have been detected in water, sediment or tissue. In most cases no water quality standard was exceeded nor was a use shown to be impaired. The review was conducted specific to each basin. The enclosed attachment gives specific documentation for the definitions and derivations of each category.

Based on this documentation, the action is to delist the following subsegments for the specified categories (refer to the documentation for specific facts and information):

Calcasieu River Basin (03)

- 1) Delist priority organics as a suspected cause for subsegments 030301, 030302, 030303, 030304, 030305, 030306, 030401, and 030402. Subsegment 030901 will remain on the list for priority organics because of a fish consumption advisory for HCB, HCBd and PCBs.
- 2) Delist non-priority organics as a suspected cause from subsegments 030302, 030306, and 030901.
- 3) Delist other inorganics as a suspected cause from subsegment 030901.

Ouachita River Basin (08)

- 1) Delist priority organics as a suspected cause from subsegment 080101. Subsegment 080904 will remain on the list for priority organics because of a fish consumption advisory for dioxin.
- 2) Delist other inorganics as a suspected cause from segments 080401, 080603, 080905, and 081201.
- 3) Delist the non-priority organics listing for subsegments 081401 and 081601.
- 4) Delist unknown toxicity as a suspected cause for subsegment 080301.

These actions are justified and supported by the documentation. We are pleased that Region 6 EPA requested that LDEQ define these general categories and look forward to your finalizing the review of our delistings that have resulted from your request.

Sincerely,

Robert P. Hannah, Administrator
Environmental Planning Division

Enclosure
RPH:dss